

DEC 09 2009

Larry Meredith, Ph.D., Director

December 8, 2009

Mr. Ramon S. Lopez, Chief  
Civil Rights Bureau  
Human Rights and Community Services Division  
744 P Street, N.S. 8-16-70  
Sacramento, CA 95814

RE: Civil Rights Compliance Review Corrective Action Plan

Dear Mr. Ramon:

Enclosed is the Marin County Department of Health And Human Services Corrective Action Plan in response to the Civil Rights Compliance Review conducted in December 2008. Please feel free to contact me with any questions at (415) 499-6015.

Also, the department has a new Civil Rights Coordinator. Her name is Stephanie Kentala. Her telephone number is 499-6928.

Sincerely,

  
Chris Schuepbach  
Civil Rights Coordinator (former)

cc: Larry Meredith, Ph.D., Director, Health and Human Services  
Stephanie Kentala, HHS Personnel Manager/Civil Rights Coordinator.

December 8, 2009

To: Jim Tashima  
From: Chris Schuepbach  
Subject: Response to Civil rights Compliance Review Report

County of Marin Health & Human Services Corrective Action Plan (CAP)

**DISSEMINATION OF INFORMATION**

<b>Signage Posters,Pamphlets</b>	<b>Corrective Action</b>	<b>Compliance Resolve</b>
<b>Translated Pub 13 All Locations</b>  With regard to display of Pub 13 pamphlet to ensure LEP clients know in what language pamphlet available, County will display pamphlet on a bulletin board with a poster in multiple languages indicating what ,where, and how to get their own copy.	County shall ensure the current version of the Pub 13 is available in all languages translated by CDSS and translated versions are distributed to clients in their primary language, Div.21-115.2	Assignment of designated staff employees @ 120 N. Redwood, 3250 Kerner and 10 North San Pedro locations will be responsible for ordering and stocking current version of Pub 13. Exception is Adult Protective Services (APS)
<b>Pub 13 Visual, Audio, Braille Availability</b>	Make the Pub 13 available in large print, audiocassette/CD and Braille	10 North San Pedro will order these materials and make available.
<b>Posting of Current Versions of Required Posters</b>	120 Redwood 1 <sup>st</sup> floor reception area needs "And Justice for All" poster	120 Redwood will post this missing poster "And Justice for All"
<b>Instructional/Directional Signage</b>	County needs to ensure that instructional and directional signs are posted in waiting areas and other places frequented by clients, and in those areas frequented by a substantial number of non-English speaking clients, signage will be translated into appropriate languages. Div.21-107.212 & .24	Current revisions of signs with appropriate translations will be posted in designated areas at 120 N. Redwood.

**FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**  
**Title 24, California Code of Regulations (T24 CCR)**

<b>Facility Location/Element</b>	<b>Corrective Action</b>	<b>Compliance Resolve</b>
<b><u>10 North San Pedro</u></b>		Targeted renovation completion is 9/2010
<b>Parking Signage</b>	Disabled parking sign height and wall signage height require adjustment to comply with CA T24 1129B.5,ADA 4.6.5 p.133	Will be corrected during ongoing extensive renovation of facility.
<b>Disabled Parking Spaces</b>	Length of parking spaces will be adjusted. (CA T24 1129B.4.1) p.135; Access aisle adjusted to 18'x5' minimum for cars; Van access to 18'x8' minimum on passenger side.(CA T24 1129B4.1,ADA 4.6.3	Will be corrected during ongoing extensive renovation of facility. Completion by September 2010
<b>Route to Main Door</b>	Disabled parking slots need to be closer to reception area. Relocate disabled parking slots following building ramps. (CA T24 1129B.1.2,ADA 4.3.2(1)	Will be corrected during ongoing extensive renovation. Targeted completion September 2010
<b>Ramps</b>	Disabled access ramp at south end of building. Pedestrian ramps need minimum width of 48"(CA T24 1133B.5.2.1); Handrails required and mounted accordingly (CA T24 1133B.5.5.1,ADA 4.26.2)	Will be corrected during ongoing extensive renovation. Ramps are expected to be completed by end of calendar year 2009
<b>Directional Signage</b>	Critical need to indicate how a disabled person must proceed to gain access to reception area. Sign with international symbol mounted indicating direction to accessible features at every major entrance (CA T24 1127B.3,ADA 4.1.3(16B), T24 1117B.5.8.1.2,; and that characters and symbols comply with CA T24 1117B.5.2, ADA4.30.5	Will be corrected during ongoing extensive renovation. Targeted completion September 2010.

<b>Men's Restroom: Signage</b>	Make accessible signage for Men's Restroom, and available in Braille. Door and wall sign placed 60" above floor; Placement of sign will comply with (CA T24 1117B.5.7, ADA 4.30.6);and raised characters accompanied by Grade 2 Braille. (CA T23 1117B.5.51.ADA 4.30.4)	Will be corrected during ongoing extensive renovation. Targeted completion September 2010.
<b>Men's Restroom: Door Pressure</b>	Force to open doors, exterior and interior will be 5 pounds maximum (CA T24 1133B.2.5,ADA 4.13.11(2)(a) & (b)	Will be corrected during ongoing extensive renovation. Targeted completion September 2010
<b>Men's Restroom: Sink</b>	Interior Door will have 5 pounds maximum pressure (CA T24 1115B.2.1.2.2, ADA 4.19.4)	Will be corrected during ongoing extensive renovation. Targeted completion September 2010
<b>Men's Restroom: Accessible Stall</b>	Toilet tissues dispensers will be located on the wall 12" of front edge of toilet seat. (CA ACRM 1115B.9.3) Toilet paper dispenser minimum height from floor will be 19" (ADA 4.16.6)	Will be corrected during ongoing extensive renovation. Targeted completion September 2010
<b>Women's Restroom: Signage</b>	Installing missing door and wall ISA signs with Braille. Door and wall sign placed 60" above floor; Placement of sign will comply with (CA T24 1117B.5.7, ADA 4.30.6; and raised characters accompanied by Grade 2 Braille. (CA T23 1117B.5.51.ADA 4.30.4)	Will be corrected during ongoing extensive renovation. Targeted completion September 2010
<b>Women's Restroom: Door Pressure</b>	Pressure on interior door will be 5 pounds maximum pressure. (CA T 24 1133B.2.5,ADA 4.13.11(2)(b)	Will be corrected during ongoing extensive renovation. Targeted completion September 2010
<b>Women's Restroom Sink</b>	Hot water and drain pipes will be insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T 24 1115B.2.1.2.2., ADA 4.19.4)	Will be corrected during ongoing extensive renovation. Targeted completion September 2010
<b>Women's Restroom Accessible Stall</b>	Toilet tissue dispenser will be located on the wall within 12" of front edge of toilet seat. (CA – ACRM 1115.B.9.3)	Will be corrected during ongoing extensive renovation. Targeted completion September 2010

Facility Location: 120 Redwood

Facility Element	Corrective Action	Compliance Resolve
First Floor Men's Restroom: Signage	The "red" door will have ISA. Door and wall sign placed 60" above floor; Placement of sign will comply with (CA T24 1117B.5.7, ADA 4.30.6); and raised characters accompanied by Grade 2 Braille. (CA T24 1117B.5.7, ADA 4.30.6, and (CA T 24 1117B.5.5.1 ,ADA 4.30.4)	Targeted completion by July 2010
First Floor Men's Restroom: Sink	Hot water and drain pipes will be insulated or covered. No sharp or abrasive surfaces under lavatories.	Targeted completion by July 2010
First Floor Men's Restroom: Accessible Stall	Toilet tissue dispenser will be located within 12" of front edge of toilet seat. (CA – ACRM 1115B.9.3)	Targeted completion by July 2010
Second Floor Men's Restroom: Signage	Wall signage will conform to standard ISA symbol & Braille. Door and wall sign placed 60" above floor; Placement of sign will comply with (CA T24 1117B.5.7, ADA 4.30.6); and raised characters accompanied by Grade 2 Braille. (CA T24 1117B.5.7, ADA 4.30.6, and (CA T 24 1117B.5.5.1 ,ADA 4.30.4)	Targeted completion by July 2010
Second Floor Men's Restroom: Accessible Stall	Toilet tissue dispensers will be located within 12" of front edge of toilet seat. (CA – ACRM 1115B.9.3)	Targeted completion by July 2010
First Floor Women's Restroom: Signage	Wall sign near red door will display standard ISA signage. Door and wall sign placed 60" above floor; Placement of sign will comply with (CA T24 1117B.5.7, ADA 4.30.6); and raised characters accompanied by Grade 2 Braille. (CA T24 1117B.5.7, ADA 4.30.6, and (CA T 24 1117B.5.5.1 ,ADA 4.30.4)	Targeted completion by July 2010
First Floor Women's Restroom: Door Pressure	Pressure on interior door will be 5 pounds maximum pressure. (CA T 24 1133B.2.5,ADA 4.13.11(2)(b)	Completion date by July 2010

Facility 120 Redwood Continued

First Floor Women's Restroom: Sink	Hot water and drain pipes will be insulated or covered. No sharp or abrasive surfaces under lavatories.	Targeted completion by July 2010
First Floor Women's Restroom: Accessible Stall	Toilet tissue dispensers will be located within 12" of front edge of toilet seat. (CA – ACRM 1115B.9.3) Toilet paper dispenser minimum height from floor will be 19" (ADA 4.16.6)	Targeted completion by July 2010
Second Floor Women's Restroom: Signage	Wall sign will display standard ISA signage. Door and wall sign placed 60" above floor; Placement of sign will comply with (CA T24 1117B.5.7, ADA 4.30.6); and raised characters accompanied by Grade 2 Braille. (CA T24 1117B.5.7, ADA 4.30.6, and (CA T 24 1117B.5.5.1 ,ADA 4.30.4)	Targeted completion by July 2010
Second Floor Women's Restroom: Door Pressure	Pressure on interior door will be 5 pounds maximum pressure. (CA T 24 1133B.2.5,ADA 4.13.11(2)(b)	Targeted completion by July 2010
Second Floor women's Restroom: Accessible Stall	Toilet tissue dispensers will be located within 12" of front edge of toilet seat. (CA – ACRM 1115B.9.3) Toilet paper dispenser minimum height from floor will be 19" (ADA 4.16.6)	Targeted completion by July 2010

Facility Location: 3250 Kerner Wellness Campus

Facility Element	Corrective Action	Compliance Resolve
Parking Signage	Additional signage of unauthorized parking will be posted at entrances to off-street parking facilities and conform to size and lettering (CA T24 1129B.5)	Targeted completion by July 2010
Main Entrance Signage	ISA Sign will be displayed at @ primary entrance and major junction indicating direction to accessible feature,(CA T24 1127B.3,ADA 4.1.3 (16B),CA T24 1117B.5.8.1.2; and conform to characters, symbols, non glare finish background (CA T24 1117.B.5.2, ADA 4.30.5)	Targeted completion by July 2010

Facility Location 3250 Kerner Wellness Campus continued

<b>Client Accessible Rooms: Door Pressure</b>	Interior Door will have 5 pounds maximum pressure (CA T24 1133B.2.5, ADA 4.13.11(2)(b))	Targeted completion by July 2010
<b>Men's Restroom Signage</b>	Door and wall signs will be 60" above the floor and be displayed in compliance with (CA T24 1117B.5.7, ADA 4.30.6)	Targeted completion by July 2010
<b>Men's Restroom: Door Pressure</b>	Interior Door will have 5 pounds pressure. (CAT24 1133B.2.5, ADA 4.13.11(2)(b))	Targeted completion by July 2010
<b>Men's Restroom: Accessible Stall</b>	Toilet tissue dispensers will be located within 12" of front edge of toilet seat. (CA – ACRM 1115B.9.3) Toilet paper dispenser minimum height from floor will be 19" (ADA 4.16.6)	Targeted completion by July 2010
<b>Women's Restroom Signage</b>	Door and wall sign placed 60" above floor; Placement of sign will comply with (CA T24 1117B.5.7, ADA 4.30.6); and raised characters accompanied by Grade 2 Braille. (CA T24 1117B.5.7, ADA 4.30.6)	Targeted completion by July 2010
<b>Women's Restroom: Door Pressure</b>	Interior Door will have 5 pounds pressure. (CAT24 1133B.2.5, ADA 4.13.11(2)(b))	Targeted completion by July 2010
<b>Women's Restroom: Accessible Stall</b>	Toilet tissue dispensers will be located within 12" of front edge of toilet seat. (CA – ACRM 1115B.9.3) Toilet paper dispenser minimum height from floor will be 19" (ADA 4.16.6)	Targeted completion by July 2010

**V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS – NON ENGLISH SPEAKING OR WITH DISABILITIES**

**Corrective Actions**

Area of Findings	Corrective Actions	Compliance Resolve
Written Materials	County will use and provide translated forms in client's primary languages when translated by CDSS. Forms and written materials will be provided in individual's primary language	Forms will be translated into client's primary language within 90 days of submission of report
Notices of Action	For IHSS information is not inserted for client and NOAs available in English & Spanish only. Usage of translated forms and materials requiring inserted information will be in client's primary language. Div. 21-115.2	For all non IHSS clients, County will provide inserted information in client's primary language within 90 days of submission of report
Auxiliary Aids	County will avail auxiliary aids and services to persons deaf or hearing impaired , or with impaired speech, vision or manual skills to access program services.	Training will be provided for all front line reception staff on locations of TDD devices. All staff will be re familiarized with TDD devices and CA. Relay System and its usage within 90 days of report submission

**VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**

**Corrective Actions**

Areas of Action	Corrective Action
Documentation – Client Provided Interpreter	<u>CWD</u> will document in case record that applicant/recipient informed of potential problem of ineffective communication. Div.21-116.23 within 90 days of report submission.
Documentation of Interpreter signed confidentiality statement	Consent for release of information will be obtained from applicants/recipients when non CWD employees are used as interpreters and case record documented. Div. 21-116.24 within 90 days of report submission.
Documentation of Primary Language	Each agency will ensure case record identification shows applicant/recipient ethnic origin and primary language. Div 21-201.21 within 90 days of report submission



**Documentation of Applicant/Recipient Case Records continued**

<b>Areas of Action</b>	<b>Corrective Action</b>
<b>Documentation – Bilingual Services Provided</b>	<b>Document method used to provide bilingual services, e.g. assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter or client provided interpreter. Div. 21-116.22 within 90 days of report submission.</b>

**VII. STAFF DEVELOPMENT AND TRAINING**

**Corrective Actions**

<b>Training Area</b>	<b>Corrective Action</b>
<b>MEPA Training for Children's Social Workers</b>	<b>County will ensure that CSW's receive MEPA training by arranging and conducting Multi Ethnic Placement Act training refresher for all Child Welfare &amp; Social Worker staff to ensure knowledge of and application of placement prohibitions in MEPA. 41 U.S.C.672,674, and 1996(b) within 90 days of report submission.</b>

**VIII. DISCRIMINATION COMPLAINT PROCEDURES**

**Corrective Action**

<b>Element</b>	<b>Corrective Action</b>
<b>Discrimination Process</b>	<b>County will ensure staff have knowledge of discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117 and 21-203. Department will review current training and incorporate training issues into annual Social Services Division 21 training</b>
<b>Civil Rights Coordinator</b>	<b>County will ensure HHS staff is knowledgeable regarding contact information of civil rights coordinator, and at minimum, know where the information can be located. Div. 21-117 and 21-107.21 within 90 days of report submission</b>